

**EEL RIVER FAMILY FARMS, LLC
APNs: 211-151-017
CULTIVATION AND OPERATIONS MANUAL
HUMBOLDT COUNTY, CA**

**COMMERCIAL CANNABIS
CULTIVATION FACILITIES**

PREPARED FOR:



UPDATED MARCH 2024

Commercial Cannabis Cultivation Facilities
APN: 211-151-017

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1. PROJECT SUMMARY

1.1. PROJECT OBJECTIVE

Eel River Family Farms, LLC is applying for a Conditional Use Permit on APN:211-151-017 through the County of Humboldt's Commercial Medical Marijuana Land Use Ordinance (CCMLUO). The applicant seeks to permit 17,996 sq. ft. of mixed light cultivation. Cultivation is proposed to occur in a combination of eight (8) greenhouses that range in width from 20' to 35 ft and length from 72 ft to 150 ft.

The project proposal includes the reorganization of the upper site to remove the existing greenhouses outside of the 30' SRA setback and the addition of (18) 5,000-gallon water storage tanks. Proposed water storage is 204,000 gallons and is estimated to be 100% of the project needs. Energy is sourced through PG&E and will be required to enroll in the renewable energy program.

1.2. SITE DESCRIPTION

The project site is located on APN 211-151-017 in the Redcrest area, on the west side of Dyerville Loop Road, on the property known as 1752 Dyerville Loop Road. The site is 32 acres in the Cameron Creek-Eel River HUC-12 watershed. The subject property has been historically used for timber and cannabis cultivation. The existing cannabis cultivation site activities total approximately 17,996 sq. ft. The existing upper site encroaches into the 30's SRA setback and into the parcel to the north by 13-21 ft. The greenhouses are proposed to be reorganized and relocated outside of the SRA setback. The approximate 2,500 sq. ft. of disturbance that is located on the northern parcel includes weed fabric and a gravel base. Weed fabric and gravel will be removed with native grass seed and straw will be applied.

1.3. LAND USE

The property is zoned Timber Production Zone (TPZ). Land uses surrounding the parcel are comprised of TPZ or Unclassified with a general plan designation of Timber (T).

1.4. STATE AND LOCAL COMPLIANCE

1.4.1. DEPARTMENT OF CANNABIS CONTROL – CALCANNABIS

Eel River Family Farms, LLC has obtained a Commercial Cannabis Activity license from the State of California for the pre-existing cannabis cultivation.

1.4.2. STATE WATER RESOURCES CONTROL BOARD – WATER RIGHTS

Water is sourced from an existing permitted well (16/17-0149; WCR2017-001434). Water will be pumped and stored during the winter and spring months. Eel River Family Farms is proposing to have 100% of the estimated water demand stored in hard sided tanks. No diversionary water source is proposed for this project.

1.4.3. STATE WATER RESOURCES CONTROL BOARD AND NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD – WATER QUALITY

The applicant is enrolled for coverage as a Tier 1, Low Risk (WDID: 1_12CC417268) under the SWRCB General Order WQ 2019-0001-DWQ *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Dischargers of Waste Associated with Cannabis Cultivation Activities* Order. The purpose of the SWRCB Order is to implement the requirements for waste discharges associated with cannabis cultivation as described in SWRCB's *Cannabis Cultivation Policy – Principles*

and Guidelines for Cannabis Cultivation (“Policy”). Prior to the commencement of cultivation operations, a Site Management Plan will be developed for the property to describe how the discharger is complying with the applicable Best Practicable Treatment or Control (BPTC) Measures listed in Attachment A of the Order/Policy.

The Tier 1, Low Risk discharger status reflects current operations that disturb less than one acre. The applicant’s proposal will keep all cultivation activities out of riparian setbacks to maintain Low Risk status with SWRCB.

1.4.4. HUMBOLDT COUNTY BUILDING DEPARTMENT

Upon project approval, all necessary building permits will be obtained from the Humboldt County Building Department for all existing/proposed structures and supporting infrastructure.

1.4.5. CAL FIRE

The subject property is located within a State Responsibility Area (SRA) for fire protection. Proposed improvements include management of trees and vegetation around existing structures to maintain the required 100-foot defensible space. All structures on the property meet the 30-foot SRA setback requirement from property lines. The project proposes a designated fire turn-around and pull-out area for emergency vehicles and one (1) 2,500-gallon water tank dedicated to SRA emergency response. If needed, risers to SRA specifications will be installed for firefighting purposes.

1.4.6. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

A Lake and Streambed Alteration Agreement (LSAA) was notified to the Department of Fish and Wildlife. An agreement was issued under 1600-2017-0547-R1. There are two stream crossings on the parcel.

1.4.7. CULTURAL RESOURCES

If buried archaeological or historical resources are encountered during construction or cultivation activities, the applicant or contractor shall call all work in the immediate area to halt temporarily, and a qualified archaeologist is to be contacted to evaluate the materials. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, dietary bone, and human burials. If human burial is found during construction, state law requires that the County Coroner be contacted immediately. If the remains are found to be those of a Native American, the California Native American Heritage Commission will then be contacted by the coroner to determine appropriate treatment of the remains. The applicant is ultimately responsible for ensuring compliance with this condition.

2. CULTIVATION AND PROCESSING

2.1. PROPAGATION AND INITIAL TRANSPLANT

The applicants propose to propagate juvenile plants on-site from seeds and mother plants within the proposed 15’x85’ building or retain clones from an offsite-licensed facility. Mother plants will remain in the vegetative stage solely for propagation. Cuttings will be sampled from the mother plants and rooted into a growing medium (e.g. oasis cubes) to produce clones. When the clones reach a juvenile state they will then be transferred to the cultivation area, and after 2-3 weeks will be transplanted into the raised beds in the flowering greenhouses. The juvenile plants will be irrigated using hand watering methods, and after three weeks they will continue their vegetative cycle and eventually flower. For the artificial lighting used to assist with the enhancement of plant growth, the lights will

be set on timers that activate ½ hour before sunset daily. Prior to sunset each day, blackout tarps are automatically or manually pulled over the mixed light greenhouses and nursery to prevent all light from escaping. The blackout tarps are constructed out of 2 ply-10-millimeter plastic with internal threading for shear strength.

2.2. OUTDOOR CULTIVATION PLAN

The existing cultivation total is 17,796 sq. ft. and uses approximately 204,000 gallons per year. The mixed light cultivation is proposed to occur in eight (8) greenhouses that range in width from 20' to 35 ft and length from 72 ft to 150 ft. The greenhouses consist of heavy gage steel tubing covered with a woven poly translucent opaque tarp or corrugated plastic. Greenhouses are proposed to be ventilated by intake and exhaust fans and will not require a slab foundation or improved flooring. Raised beds will run the length of each greenhouse. The monthly Cultivation Schedule in Appendix C details the cultivation activities associated with the outdoor light deprivation cultivation operation for a typical two cycle year.

2.3. IRRIGATION PLAN AND SCHEDULE

The existing cultivation currently uses an estimated 204,000 gallons of water for 17,796 sq. ft. of cultivation area (11.2 gal/sq.ft.). The monthly Cultivation Schedule in Appendix C details the irrigation activities associated with all cultivation.

2.4. PROCESSING (HARVESTING, DRYING AND TRIMMING)

Drying and curing will occur in the summer and fall months in the existing 15'x85' building. This building will be shared by the nursery in the late winter/early spring. All processing (trimming and packaging) will occur off-site. Plants that are ready for harvest will have their flowering branches removed and placed in plastic containers and transported to the 15'x85' building where they will be suspended and left to dry for approximately one week. The dried flowers will be bucked into manageable buds and transported to an off-site processing facility.

All cannabis processing (trimming) will occur off site.

2.5. EMPLOYEE PLAN

The applicant is an “agricultural employer” as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 of Division 2 of the Labor Code), and complies with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

2.5.1. JOB DESCRIPTIONS AND EMPLOYEE SUMMARY

- *Agent in Charge*: Responsible for business oversight and management. Responsibilities include, but are not limited to: inventory and tracking, personnel management, record keeping, budget, and liaison with State and County inspectors as needed. This is a part-time to full-time, seasonal position.
- *Lead Cultivator*: Oversight and management of the day to day cultivation of commercial cannabis. Responsibilities include but are not limited to: plant propagation and transplant, soil management, irrigation, fertilization, pesticide management, and harvest activities. This is a full-time, year-round position.
- *Assistant Cultivator / Processing Manager*: Provides support to the *Lead Cultivator* in their day to day duties and takes the lead role during times when the *Lead Cultivator* may be off site. Once processing activities commence, the *Assistant Cultivator* duties switch to oversight and management of processing the dried commercial cannabis. This is a full-time, seasonal position.

- Seasonal Laborer: Provides cultivation support, harvesting, drying support and processing of cannabis. This is a part-time to full-time, seasonal position.

2.5.2. STAFFING REQUIREMENTS

In addition to the *Agent in Charge, Lead Cultivator*, up to three (3) part-time seasonal labor positions. The number of seasonal laborers varies based on the needs of the farm during the cultivation and harvest. During peak operational periods, the operation may require up to five (5) employees.

2.5.3. EMPLOYEE TRAINING AND SAFETY

On-site cultivation, harvesting and drying will be performed by employees trained on each aspect of the procedure including cultivation/harvesting techniques, use of pruning tools, and proper application/storage of pesticides and fertilizers. All cultivation staff will be provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the on-site cultivation and drying facilities will be limited to authorized and trained staff. All employees will be trained on proper safety procedures including fire safety, use of PPE, proper hand washing guidelines, and emergency protocol. Contact information for the local fire department, Cal Fire, Humboldt County Sheriff and Poison Control as well as the Agent in Charge will be posted at the employee restroom. Each employee is provided with a written copy of emergency procedures and contact information. The material safety data sheets are kept on site and accessible to employees.

2.5.4. TOILET AND HANDWASHING FACILITIES

A temporary portable toilet and handwashing station will be used on site for the cultivation employees. Cultivation employees will have access to anti-bacterial Liquid Soap and paper hand towels. Work will occur at a distance no greater than 600 feet from the restroom facility.

2.5.5. ON SITE HOUSING

There is no residential structure on the subject parcel. Employees will commute to the site.

2.5.6. PARKING PLAN

Parking is proposed to be located on both the upper and lower cultivation sites. Five (5) parking spaces are located near the drying and curing area. (Appendix A).

2.6. SECURITY PLAN AND HOURS OF OPERATION

2.6.1. FACILITY SECURITY

The property is accessed through an entry gate that remains locked at all times. Cultivation facilities (greenhouses, storage sheds, drying facility) will only be accessible through the locked gate. Access to the area is limited to employees and approved personnel including agency staff, consultants, and distributors.

2.6.2. HOURS OF OPERATION

Activities associated with cultivation in the greenhouses (watering, transplanting, and harvesting) generally occur during daylight hours. All other activities such as harvesting and drying typically occur no earlier than 8 AM and extend no later than 8 PM.

3. ENVIRONMENT

3.1. WATER SOURCE, STORAGE, AND PROJECTED USE

Irrigation water is proposed to be sourced from the permitted well. Water will be pumped from a non-diversionary ground water well. Water storage is comprised of a total of 204,000-gallon in hard

sided tanks. The well will be used in the winter and spring months to fill the 204,000 gallons of storage. The proposed storage is estimated to be 100% of the project demand. Refer to section 2.3 for a summary of irrigation practices.

The table below outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will have a slight effect on water use.

The annual water demand is estimated to be approximately 204,000 gallons (11.2 gallons/sq. ft.). Table 1 outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will have a slight effect on water use.

Table 1: Estimated Annual Irrigation Water Usage (gallons)

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Total
0	0	4,000	10,000	20,000	35,000	45,000	45,000	35,000	10,000	0	0	204,000

3.1.1. SITE DRAINAGE, RUNOFF, AND EROSION CONTROL

The applicant has enrolled with the State Water Resources Control Board (SWRCB) for coverage under the General Order. A Site Management Plan (SMP) for existing site conditions has been developed; the SMP will be updated to will the proposed expansion and detail erosion control and sediment capture measures, as well as road maintenance and runoff activities.

3.1.2. STORMWATER MANAGEMENT PLAN

The proposed cultivation activities will take place in the existing flats on slopes less than 10%. The greenhouse skins will be removed each season before the rainy season begins. Raised beds will be planted with cover crop. No other structures are proposed. Impermeable surfaces are not proposed to increase.

Stormwater management for the remainder of the property is addressed in the SMP, which will also include recommendations for road network maintenance. Existing and proposed structures are located over 50-ft from any watercourses, providing a sufficient buffer to prevent potential sediment or nutrient delivery.

3.1.3. EROSION CONTROL

The SMP will include erosion and sediment control best practicable treatment controls (BPTCs) designed to prevent, contain, and reduce sources of sediment. Additionally, the SMP will include site-specific corrective actions to ensure property maintenance and erosion control.

3.2. WATERSHED AND HABITAT PROTECTION

All proposed cultivation activities will meet setbacks and should provide a suitable buffer between the cultivation operation and sensitive habitat. No new ground disturbance is proposed as all cultivation is located on already-disturbed ground. No major grading is proposed.

All light from the nursery shall be attenuated so that it does not create a new source of light or glare that could adversely impact local wildlife. Proposed activities would not increase ambient noise by greater than 3 decibels. Additionally, adherence to the Site Management Plan will ensure that erosion control and sediment capture BPTC measures are in place to prohibit water quality degradation of the nearby river.

3.3. INVASIVE VEGETATIVE SPECIES CONTROL PLAN

Once proposed cultivation activities commence, the cultivation area will be monitored for invasive species. If invasive species are located, hand tools (shovels, weed wrenches, trowels, or hand saws) may be used to remove them. The exact rate and method of invasive species removal will be determined based on the species identified. The areas of disturbance shall be surveyed and maintained twice each year, at a minimum, as part of the invasive species control plan.

The following is a partial list of websites to be used for proper identification and treatment:

1. <https://calflora.org/>
2. <https://plants.usda.gov/java/>
3. <https://www.cal-ipc.org/>
4. <https://www.cal-ipc.org/solutions/>
5. <http://www.rareplants.cnps.org/>
6. <https://www.wildlife.ca.gov/Conservation/Plants#22064102-california-native-plant-information>
7. <http://ucjeps.berkeley.edu/>
8. http://wetland-plants.usace.army.mil/nwpl_static/v33/home/home.html
9. <https://www.fws.gov/invasives/partnerships.html>

3.4. MATERIALS MANAGEMENT PLAN

Cultivation, harvesting, and drying shall be performed by employees trained on each aspect of the procedure, including cultivation, and harvesting techniques, the use of pruning tools, and proper application/storage of pesticides/ and fertilizers. All cultivation and processing staff are provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the onsite cultivation, drying and processing facilities are limited to authorized and trained staff. Mixing of fertilizers in small storage tanks is solely conducted in a designated area (to be determined) where the mix will not enter surface waters. For young plants, the mix is applied via watering wand and mature plants are fertigated at agronomic rates by drip emitters or hand watering methods. Spent soil is amended and reused as needed. The application of any agricultural chemical products will be conducted according to the manufacturer's recommendation.

Employees are trained on usage and handling procedures of associated equipment and cleaning procedures. Chemicals and hazardous materials are only used with equipment as recommended by manufacturers. Cleaning will occur regularly with instructions based on the manufacturer's recommendations. All cleaning materials will be put away and stored properly within secondary containment when not in use and hazardous containers will be properly disposed of. Additionally, if there are any spills on site, there will be a spill kit with sorbent pads that will be accessible.

On-site inventory is kept for all chemicals. Chemicals are used and stored based on manufacturer's recommendations and requirements. Any materials required for the use of chemicals will be provided to employees. The material safety data sheets (MSDS) are kept on site and accessible to employees.

All hazardous waste will be stored within secondary containment. Additionally, a log will be kept in order to keep the volume of hazardous waste accounted for. Fertilizers and pesticides are being stored in a separate location from petroleum products. The aforementioned products will be located within secondary containment in a storage shed. No rodenticides will be used on site. At the end of the season, any unused liquid products are stored in secondary containment and will be applied the following year. Before unused products are stored at the end of the season, an employee will take inventory on the volumes and products. Additionally, all waste will be properly disposed of off-site

and the correct facility. All trash, empty product containers, and recycling are hauled off-site bi-weekly to nearest licensed waste management facility.

Appropriate BPTC measures are being utilized when storing, handling, mixing, applying, and disposing of all fertilizers, pesticides, herbicides, rodenticides, or any other hazardous materials. Each year an inventory is conducted prior to the beginning of the grow season and necessary products are delivered to the site as needed.

3.5. SOILS MANAGEMENT PLAN

The applicant is proposing to plant all cultivation in raised beds within the greenhouse structures. The applicants will account for and keep records of annual and seasonal volumes of soil imported and exported on and off site. Any purchased soils will be reamended for use the following year. During the wet season, any soil piles will be located in a flat area outside of riparian setbacks and winterized, likely with a tarp underneath the pile and straw wattles located around the pile to prevent leachate from entering surface waters. Potential spent soils will be properly disposed of off-site at an appropriate facility.

3.6. HAZARDOUS WASTE STATEMENT

There are no hazardous materials mapped onsite. A search of the EnviroSTOR database shows no GeoTracker Cleanup Programs on-site.

3.7. ENERGY PLAN

Power will be sourced from the existing PG&E drop. A generator will remain onsite for backup emergency use.

3.8. WASTE MANAGEMENT

3.8.1. CULTIVATION

Organic cultivation-related waste, including root balls, branches, and leaves will be hauled off site to a green waste management facility as needed. Trash and recycling from cannabis operations, including empty soil or fertilizer bags, liquid fertilizer bottles, cultivation supplies, etc., will be taken to the nearest waste management facility as needed.

3.8.2. SEWAGE DISPOSAL PLAN

A temporary portable toilet and handwashing station will be used on site for the cultivation employees. Cultivation employees will have access to anti-bacterial Liquid Soap and paper hand towels. Work will occur at a distance no greater than 600 feet from the restroom facility.

4. PRODUCT MANAGEMENT

4.1. PRODUCT TESTING AND LABELING

Samples will be selected from individual harvested cannabis strains and tested by a licensed third-party lab in accordance with State and local standards. The finished product is labeled and will include tracking ID's provided by the California Cannabis Track-and-Trace (CCTT) METRC system.

4.2. PRODUCT INVENTORY AND TRACKING

The applicants will follow all regulations and requirements set by the CCTT-METRC system. After approval of state licenses related to the proposed cultivation, the applicants will request credentials

and order unique identifiers (UIDs) which will be assigned to each immature lot, flowering plant, and distinct cannabis product.

4.3. TRANSPORTATION AND DISTRIBUTION

Transportation will be handled by a licensed transporter/distributor in accordance with State and Local regulations. All merchantable product will be distributed through licensed commercial cannabis dispensaries. The CCTT-METRC system will be used for all transactions with distributors or transporters.

APPENDIX B: CULTIVATION ACTIVITIES SCHEDULE

Item	Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Drainage, Runoff, and Erosion Control	Winterization (storage of pots/greenhouse covers)										■	■	
	Temporary Erosion Control BMP's (straw, seeding, fiber rolls, etc)											■	
	Road maintenance											■	
	Culvert and inboard ditch maintenance/inspection		X								■		■
	Cultivation waste hauled off site											■	■
	Cover soil beds and seed/straw with cover crop											■	■
Irrigation Activities	Irrigation of juvenile plants /clones			■	■	■							
	Irrigation of flowering plants					■	■	■	■	■	■		
Pre-cultivation Activities	Transplant cuttings into pots				■	■							
	Transplant clones into beds					■							
	Amend soil in greenhouses				■								
	Import new cultivation soil												
Outdoor Cultivation and Harvest Schedule	Outdoor Cultivation Cycle					■	■	■	■	■	■		
	Harvest activities							■	■		■	■	
Drying and Processing	Drying activities							■	■	■	■	■	
	Trimming activities (Will take place offsite)								■	■	■	■	
Staffing Presence	Agent in Charge			■	■	■	■	■	■	■	■	■	
	Lead Cultivator			■	■	■	■	■	■	■	■	■	
	Seasonal Laborors					■	■		■	■	■	■	

APPENDIX C: REFERENCES

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